



**NATIONAL POTATO COUNCIL**

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October 9, 2014

EPA-HQ-OPP-2013-0226  
Environmental Protection Agency  
Mail Code 28221T  
1200 Pennsylvania Ave., NW  
Washington, DC 20460  
Submitted electronically via <http://www.regulations.gov>

RE: Public Participation Memorandum for New Active Ingredient Flupyradifurone (Docket ID EPA-HQ-OPP-2013-0226)

On behalf of the National Potato Council (NPC) and U.S. potato growers, thank you in advance for accepting and considering the comments below on the new active ingredient flupyradifurone which will be marketed by Bayer CropScience as Sivanto.

The NPC represents more than ninety percent of the commercial potato growers in the United States. Potato growers firmly believe in the responsible and judicious use of crop protection tools as a way to protect the environment while providing the nutritional needs of consumers around the world. NPC encourages the use of Integrated Pest Management (IPM) techniques, which enable growers to improve their pest management decisions by monitoring fields for the presence of pests, establishing thresholds for treatment, and applying pesticides to targeted problem areas.

We strongly urge the U.S. Environmental Protection Agency (EPA) to expeditiously approve Sivanto for use on potatoes. When approved, Sivanto is expected to provide a highly effective and selective tool for addressing potato pests including aphids, the potato psyllid, and leafhoppers. These pests reduce the overall quality of potato crops, and act as vectors for potato diseases like Zebra Chip. Managing Zebra Chip is critical to maintaining access to fast-growing foreign markets like South Korea which has been closed to select fresh potatoes from the Pacific Northwest (Oregon, Idaho, and Washington) since 2012 due to the presence of the potato psyllid vector. The approval of Sivanto would give growers another weapon to control the spread of the psyllid to other growing regions and reducing the possibility of further market disruption.

EPA has identified Sivanto as a candidate for approval as a “reduced risk” product. It is our understanding that this designation is based in part on data indicating it possesses a favorable risk profile for pollinators such as honey bees, bumble bees, and other beneficial insects. The outstanding environmental safety of Sivanto is enhanced by the lack of adverse effects on pollinators exhibited even when it is applied to flowering crops. This would provide a substantial measure of flexibility to growers of those crops and adjacent fields.

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Thank you again for the opportunity to comment on EPA's consideration of flupyradifurone (Sivanto). We strongly urge the agency to approve its registration for use on potatoes.

Sincerely,

A handwritten signature in black ink, appearing to read "John Keeling". The signature is fluid and cursive, with the first name "John" and last name "Keeling" clearly distinguishable.

John Keeling  
Executive Vice President and CEO  
National Potato Council